

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TILLIE SALTZMAN, Individually and On
Behalf of All Others Similarly Situated,

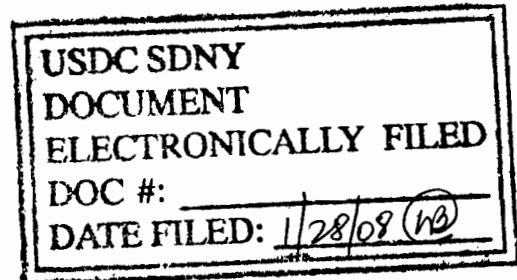
Plaintiff,

vs.

CITIGROUP INC., CHARLES O. PRINCE,
ROBERT E. RUBIN, STEPHEN R. VOLK,
SALLIE L. KRAWCHECK, GARY L.
CRITTENDEN and ROBERT DRUSKIN,

Defendants.

CIVIL ACTION NO. 07-9901-SHS



LENNARD HAMMERSCHLAG,
Individually, and On Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

CITIGROUP INC., CHARLES PRINCE,
SALLIE KRAWCHECK, GARY
CRITTENDEN,

Defendants.

CIVIL ACTION NO. 07-10258-~~JE~~ (SAB)

NOTICE OF MOTION OF THE OHIO STATE TEACHERS RETIREMENT
SYSTEM AND THE ATTORNEY GENERAL OF THE STATE OF OHIO TO
DISQUALIFY COUNSEL

+ ORDER SETTING
A RETURN DATE

Feb 8, 2008 at 2 p.m.

PLEASE TAKE NOTICE that on a ~~date and time as may be set by the Court,~~
before the Honorable Sidney H. Stein, at the United States District Court for the Southern
District of New York, located at the Daniel Patrick Moynihan United States Courthouse,
500 Pearl Street, Courtroom 23A, New York, New York 10007, the State Teachers
Retirement System of Ohio ("Ohio STRS"), and the Attorney General of the State of
Ohio (the "Ohio Attorney General" and, with Ohio STRS, "Ohio") will respectfully move
this Court for entry of an Order disqualifying Schiffrin Barroway Topaz & Kessler, LLP
("Schiffrin Barroway") and Entwistle & Cappucci LLP ("Entwistle") from representing
the Global Pension Funds¹ or otherwise acting adversely to the interests of Ohio in this
matter.

This Motion is supported by the accompanying Memorandum of Law in support
thereof, the Declaration of Honorable Marc Dann and William J. Neville filed herewith,
the Declaration of Professor Bruce A. Green filed herewith, the pleadings and other files,
and such other written or oral argument as may be permitted by the Court.

Based on the foregoing, Ohio respectfully requests that the Court issue an Order
disqualifying Schiffrin Barroway and Entwistle from representing the Global Pension
Funds in opposition to Ohio or otherwise acting adversely to the interests of

¹ Schiffrin Barroway and Entwistle represent the "Global Pension Funds" group. The Global Pension Funds are comprised of the Public Employees' Retirement Association of Colorado ("Colorado PERA"), Tennessee Consolidated Retirement System ("TCRS"), Sjunde AP-Fonden ("AP7"), Fjärde APFonden, ("AP4"), and Pensionskassernes Administration A/S ("PKA").

Ohio in this matter and grant such other and further relief as the Court may deem just and proper.

Answering papers due by January 31; reply papers by Feb. 5
The Dannaad Verill affidavit and the memoranda of law will be filed by the seat.

Dated: January 25, 2008

Respectfully submitted,

MARC DANN

ATTORNEY GENERAL OF OHIO

Christopher R. Geidner,
Counsel to the Attorney General
Andrea L. Seidt,
Deputy Chief Counsel
30 E. Broad St., 17th Floor
Columbus, Ohio 43215
Telephone: 614-466-4320
Facsimile: 614-466-5087

Counsel to the Ohio State Teachers'
Retirement System

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

Max W. Berger (MB-5010)
Gerald H. Silk (GS-4565)
Avi Josefson (AJ-3532)
Noam Mandel (NM-0203)
1285 Avenue of the Americas, 38th Floor
New York, New York 10019
Telephone: 212-554-1400
Facsimile: 212-554-1444

Counsel to the Office of the Ohio
Attorney General and the Ohio State
Teachers' Retirement System

1/25/08
S. ordered
by [signature]